

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

STATE OF MISSOURI, *et al.*,

*Plaintiffs,*

v.

JOSEPH R. BIDEN, JR.,  
in his official capacity as the President of  
the United States of America, *et al.*,

*Defendants.*

No. 4:21-cv-01329

**PLAINTIFF STATES' MOTION TO LIFT  
THE STAY OF THE DISTRICT COURT PROCEEDINGS**

Plaintiffs, the States of Missouri, Nebraska, Arkansas, Kansas, Iowa, Wyoming, Alaska, South Dakota, North Dakota, and New Hampshire, respectfully request that the Court lift the stay of the district court proceedings entered on December 22, 2021. *See* Doc. 40. In support of this Motion, the Plaintiff States incorporate by reference the arguments in their accompanying Memorandum in Support.

Dated: February 23, 2022

**DOUGLAS J. PETERSON**  
**Attorney General of Nebraska**

/s/ James A. Campbell  
James A. Campbell\*  
*Solicitor General of Nebraska*  
Office of the Nebraska Attorney General  
2115 State Capitol  
Lincoln, NE 68509  
(402) 471-2682  
Jim.Campbell@nebraska.gov  
*Counsel for Plaintiffs*

Respectfully submitted,

**ERIC S. SCHMITT**  
**Attorney General of Missouri**

/s/ Jesus A. Osete  
Jesus A. Osete, #69267MO  
*Deputy Attorney General of Missouri*  
D. John Sauer, #58721MO  
*Solicitor General of Missouri*  
Maddie McMillian Green, #73724MO  
*Assistant Attorney General for Special Litigation*  
Office of the Missouri Attorney General  
Post Office Box 899  
Jefferson City, MO 65102  
(573) 751-1800  
Jesus.Osete@ago.mo.gov  
*Counsel for Plaintiffs*

*Additional counsel listed below*

**LESLIE RUTLEDGE**  
**Attorney General of Arkansas**

/s/ Dylan L. Jacobs  
Dylan L. Jacobs  
*Deputy Solicitor General*  
Office of the Arkansas Attorney General  
323 Center St., Suite 200  
Little Rock, AR 72201  
(501) 682-2007  
Dylan.Jacobs@arkansasag.gov  
*Counsel for the State of Arkansas*

**DEREK SCHMIDT**  
**Attorney General of Kansas**

/s/ Kurtis Wiard  
Kurtis Wiard  
*Assistant Solicitor General*  
Office of the Kansas Attorney General  
120 SW 10th Avenue, 2nd Floor  
Topeka, Kansas 66612  
Tel: (785) 296-2215  
Fax: (785) 296-6296  
E-mail: kurtis.wiard@ag.ks.gov  
*Counsel for the State of Kansas*

**JEFFREY S. THOMPSON**

Solicitor General

/s/ Samuel P. Langholz

Samuel P. Langholz

*Assistant Solicitor General*

Office of the Iowa Attorney General

1305 E. Walnut Street

Des Moines, Iowa 50319

(515) 281-5164

[jeffrey.thompson@ag.iowa.gov](mailto:jeffrey.thompson@ag.iowa.gov)

[sam.langholz@ag.iowa.gov](mailto:sam.langholz@ag.iowa.gov)

*Counsel for the State of Iowa*

**TREG R. TAYLOR**

**Attorney General of Alaska**

/s/ Cori Mills

Cori M. Mills

*Deputy Attorney General of Alaska*

Alaska Department of Law

1031 W. 4th Avenue, Suite 200

Anchorage, AK 99502

(907) 269-5100

[Cori.Mills@alaska.gov](mailto:Cori.Mills@alaska.gov)

*Counsel for the State of Alaska*

**DREW H. WRIGLEY**

**Attorney General of North Dakota**

/s/ Matthew A. Sagsveen

Matthew A. Sagsveen

*Solicitor General*

State Bar ID No. 05613

Office of Attorney General

500 North 9th Street

Bismarck, ND 58501-4509

Telephone (701) 328-3640

Facsimile (701) 328-4300

[masagsve@nd.gov](mailto:masagsve@nd.gov)

*Counsel for the State of North Dakota*

**BRIDGET HILL**

**Wyoming Attorney General**

/s/ Ryan Schelhaas

Chief Deputy Attorney General

Wyoming Attorney General's Office

109 State Capitol

Cheyenne, WY 82002

Telephone: (307) 777-5786

[ryan.schelhaas@wyo.gov](mailto:ryan.schelhaas@wyo.gov)

*Counsel for the State of Wyoming*

**JASON R. RAVNSBORG**

**South Dakota Attorney General**

/s/ David M. McVey

David M. McVey

*Assistant Attorney General*

1302 E. Highway 14, Suite 1

Pierre, SD 57501-8501

Phone: 605-773-3215

E-Mail: [david.mcvey@state.sd.us](mailto:david.mcvey@state.sd.us)

*Counsel for the State of South Dakota*

**JOHN M. FORMELLA**

**New Hampshire Attorney General**

/s/ Anthony J. Galdieri

Anthony J. Galdieri

*Solicitor General*

NEW HAMPSHIRE DEPARTMENT OF JUSTICE

33 Capitol Street

Concord, NH 03301

Tel: (603) 271-3658

[Anthony.J.Galdieri@doj.nh.gov](mailto:Anthony.J.Galdieri@doj.nh.gov)

*Counsel for State of New Hampshire*

**CERTIFICATE OF SERVICE**

I hereby certify that, on February 23, 2022, a true and correct copy of the foregoing and any attachments were filed electronically through the Court's CM/ECF system, to be served on counsel for all parties by operation of the Court's electronic filing system and to be served on those parties that have not appeared who will be served in accordance with the Federal Rules of Civil Procedure by mail or other means agreed to by the party.

/s/ Jesus A. Osete  
Counsel for Plaintiffs